

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO EXTEND
RESPONSE DEADLINE TO FACILITATE PENDING SETTLEMENT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his Adversary Complaint against the Defendants, including Defendant Mandy Grant, on August 26, 2024. [ECF Nos. 1, 2.] Plaintiff filed an Amended Complaint on September 25, 2024 (the "Amended Complaint"). [ECF No. 11.]

2. On January 20, 2025, Defendant Grant filed a Motion to Dismiss the Amended Complaint (the “Motion to Dismiss”). [ECF Nos. 72, 75.] Plaintiff’s response deadline is February 12, 2025. [ECF Nos. 78, 79.]

3. Plaintiff and Defendant Grant have reached a tentative settlement of Plaintiff’s claims against Defendant Grant, subject to a definitive and final signed settlement agreement and Court approval.

4. To facilitate finalizing and documenting such settlement and obtaining Court approval, Plaintiff and Defendant Grant hereby move the Court, by stipulation, for an order extending the deadline for Plaintiff to respond to the Motion to Dismiss to March 12, 2025.

Dated: February 11, 2025

/e/ Peter D. Kieselbach

Michael B. Fisco (*Admitted Pro Hac Vice*)
Peter D. Kieselbach (*Admitted Pro Hac Vice*)
GREENBURG TRAURIG, LLP
90 South Seventh St., Suite 3500
Minneapolis, MN 55402
Tel: (612) 259-9700
fiscom@gtlaw.com
kieselbachp@gtlaw.com
Counsel for Plaintiff

Dated: February 11, 2025

/e/ Brian D. Larson

Brian D. Larson, ND ID #08568
Andrew D. Cook, ND ID # 06278
OHNSTAD TWICHELL, P.C.
444 Sheyenne Street, Suite 102
P.O. Box 458
West Fargo, ND 58078-0458
Tel: (701) 282-3249
Fax: (701) 282-0825
blarson@ohnstadlaw.com
acook@ohnstadlaw.com
Counsel for Defendant Mandy Grant